

**UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

<b>LIZELLE GONZALEZ,</b>	§	
<i>Plaintiff</i>	§	
	§	
v.	§	<b>CIVIL ACTION NO. <u>7:24-cv-00132</u></b>
	§	
<b>GOCHA ALLEN RAMIREZ,</b>	§	<b>JURY DEMANDED</b>
<b>ALEXANDRIA LYNN BARRERA,</b>	§	
<b>STARR COUNTY, and</b>	§	
<b>RENE FUENTES,</b>	§	
<i>Defendants</i>	§	

**PARTIES' JOINT MOTION FOR ENTRY OF PROPOSED DISCOVERY SCHEDULE**

On July 24, 2024, the Court denied the defendants' motions to dismiss without prejudice.

*See* Minute Entry, July 24, 2024. The Court ordered the parties to confer and submit an agreed proposed discovery schedule. *Id.* The parties have met and conferred regarding a limited discovery schedule to address the defendants' assertions of immunity. The parties jointly propose the following schedule.

Deadline for parties to serve initial disclosures	August 31, 2024
Deadline for parties to serve first set of Requests for Production, Admissions, and Interrogatories (objections and responses are due according to the Federal Rules of Civil Procedure)	September 16, 2024
Deadline to send deficiency letters	Within 14 days of the receipt of responses
Deadline to respond to deficiency letters	Within 7 days of the receipt of the letter
Notice of Disputes Regarding Written Discovery (if any)	November 15, 2024
Notice of Proposed Depositions	November 1, 2024

Depositions to be taken by	January 17, 2024
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A proposed order is attached hereto.

Respectfully Submitted,

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this motion was served in accordance with the Federal Rules of Civil Procedure by electronic transmission to all registered ECF users appearing in the case on August 21, 2024.

I. Cecilia Garza  
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